

APPENDIX C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNIÓN FENOSA GAS, S.A.,

Plaintiff,

- and -

ARAB REPUBLIC OF EGYPT; THE BANK OF
NEW YORK MELLON CORPORATION; AND
THE BANK OF NEW YORK MELLON SA/NV,
LUXEMBOURG BRANCH,

Defendants.

20 CV 9160

Civ. No. 20-_____

[PROPOSED] ORDER

[PROPOSED] ORDER ALLOWING PLAINTIFF TO FILE UNDER SEAL

The Court has considered Plaintiff Unión Fenosa Gas, S.A.'s ("UFG") motion requesting permission:

- for a period of 72*
- (i) to file its Complaint and the exhibits thereto under seal, subject to review by Judge P. Kevin Castel (or any other judge assigned to this action) after Judge Castel's determination of UFG's motion for relief from a Stipulation and Order for the Production and Exchange of Confidential Information ("Protective Order") in related proceedings brought by Plaintiff under 28 U.S.C. § 1782 (the "§ 1782 Proceedings"); and
- (ii) to file a redacted version of its Complaint, together with all other case-initiating documents (except the exhibits to the Complaint), on the public docket.

The Court finds that Plaintiff's motion should be granted.

IT IS HEREBY ORDERED that Plaintiff be allowed: (i) to file its Complaint and the exhibits thereto under seal, subject to review by the judge assigned to this action after Judge

Just to be clear: you can file under seal. The seal will expire in 72 hours. Between now and then, the assigned judge will decide whether to extend the seal or not. A

Castel's determination of UFG's motion for relief from the Protective Order in the § 1782 Proceedings; and (ii) to file a redacted version of its Complaint, together with all other case-initiating documents (except the exhibits to the Complaint), on the public docket.

Dated: New York, New York

November 2, 2020

A handwritten signature in black ink, appearing to read "Peter J. Hall", written over a horizontal line.

United States District Judge (Part I)